

## REMARKS

Claims 1-4 and 7-9 are pending. Claims 5 and 6 have been canceled without prejudice to or disclaimer of the subject matter of the claims. Independent claims 1 and 7 have been amended. Applicants respectfully request continued examination of the application in response to the final Office action.

## Information Disclosure Statement

Applicants thank the Examiner for attaching to the final Office action the initialed form PTO-1449, which accompanied the Sixth Information Disclosure Statement, filed on May 23, 2007, and note that it is Applicants' understanding that the Japanese Office Action, dated January 4, 2006, is not a "prior art" document.

## Claim Rejection – 35 U.S.C. §102

Claims 1 and 4-7 have been rejected under 35 U.S.C. §102(e) for allegedly being anticipated by U.S. Patent No. 6,636,587 to Nagai *et al.* ("Nagai"). Applicants traverse the rejection for at least the following reasons.

Independent claim 1 has been amended to include features previously recited in dependent claims 5 and 6, now canceled. In particular, amended claim 1 recites, among other features, "a main control module for controlling an action of the CTI control module in accordance with a predetermined interpretation scenario that includes a current state conversion action selected according to a current state and in response to the event generated in the CTI module and a basic telephone action to be executed at a next state," and "the main control module includes an interpretation scenario management section for selecting the current state conversion action and the basic telephone action for the next state in accordance

with the predetermined interpretation scenario when the event is generated in the CTI module, and a state conversion section for converting the current state into the next state in response to the current state conversion action selected by the interpretation scenario management section."

For example, with respect to the embodiment illustrated in FIG. 6, the specification of the instant application describes that the interpretation scenario can be formulated as tables in the format of <current state, event, action>, where "current state" refers to a current operating state (ST\_\*), "event" refers to a generated event (EVT\_\*), and "action" refers to an action (On\_\*) to be performed at a next state in response to the generated event (EVT\_\*). The "action" also refers to an action for selecting a current state conversion action to convert the current state into the next state and for selecting basic telephone action(s) for the next state. (See, Specification at page 9, lines 15-21).

For instance, with respect to the exemplary system illustrated in FIG. 4, and using the predetermined interpretation scenario illustrated in FIG. 6, an interpretation scenario management section 571 of a main control module 570 can select the action "OnGotoPlayWelcomeMent" in accordance with the current state "ST\_START" and in response to the call receiving event "EVT\_WAITCALL" being generated in a CTI control module 530. Then, in accordance with the selected action "OnGotoPlayWelcomeMent," a state conversion section 573 of the main control module 570 can select a current state conversion action to convert the current state "ST\_START" to the next state "ST\_PlayWelcomeMent" and can select the basic telephone action of outputting a connection welcoming message for the next state "ST\_PlayWelcomeMent." A working section 535 of the CTI control module

530 can subsequently execute the jobs for the next state "ST\_PlayWelcomeMent" in response to the selected basic telephone action to output a welcome message. (See, Specification at page 9, line 22 – page 10, line 8). Thus, because the actions to be performed at the next state(s) are defined beforehand in accordance with the interpretation scenario, smooth interpretation services can be provided between a talker 100 and listener 300 who use different languages. (See, Specification at page 8, lines 24-28 and page 14, lines 1-6).

Nagai does not teach a current state conversion action selected according to a current state and in response to the event generated in the CTI module

Applicants respectfully disagree with the Office's characterization of Nagai on page 5 of the final Office action with respect to the features of claim 5, which have been incorporated into claim 1, as amended. Nagai teaches that a telephony agent program 311 judges the necessity of media conversion due to the difference between a sending means and a receiving means using the classification of conversion illustrated in FIG. 12. (See, Nagai at col. 20, lines 59-65). For example, as shown in FIG. 12, image-to-voice media conversion is necessary when the sending means is a facsimile and the receiving means is a telephone/portable telephone. Even if, *arguendo*, the media conversion selected in accordance with the classification of conversion of FIG. 12 in Nagai could be considered a "a current state conversion action selected according to a current state," where the current state is "the current media type," as suggested by the Office, Nagai does not teach the media conversion is selected in response to the event generated in the CTI module, in accordance with claim 1, as amended.

For example, the Office suggests on page 4 of the final Office action that Nagai, in describing a contact manager program 312 for accepting user keypad input

to select a menu associated with the changing of designated information, describes a CTI module for generating an event in response to a button signal input through the CTI board, in accordance with claim 1. (See, Nagai at col. 18, lines 32-49). Assuming, *arguendo*, that the accepting of the user keypad input by the contact manager program 312 could be considered an event generated by a CTI module, Nagai does not teach that the media conversion is selected in response to the accepting of the user keypad input by the contact manager program 312. Rather, as described herein, Nagai teaches selecting the media conversion using the classification of conversion of FIG. 12 based on the difference between the sending means and the receiving means. Thus, Applicants submit that Nagai does not teach "a predetermined interpretation scenario that includes a current state conversion action selected according to a current state and in response to the event generated in the CTI module," in accordance with claim 1, as amended.

Nagai does not teach selecting the basic telephone action for the next state in accordance with the predetermined interpretation scenario when the event is generated in the CTI module

Moreover, Applicants respectfully disagree with the Office's characterization of Nagai on pages 5-6 of the final Office action with respect to the features of claim 6, which have been incorporated into claim 1, as amended. Here, the Office suggests that determining the necessary media conversion, during a telephone call for example, based on the current media type and the requested media type of the receiver, where the requested media type at the receiver is previously registered and saved in memory, as described in Nagai, teaches "the main control module includes an interpretation scenario management section for selecting the current state conversion action and the basic telephone action for the next state in accordance

with the predetermined interpretation scenario when the event is generated in the CTI module," in accordance with claim 1, as amended.

At a minimum, Applicants submit that Nagai does not teach selecting the basic telephone action for the next state in accordance with the predetermined interpretation scenario. As described herein, because the actions to be performed at the next state(s) are defined beforehand in accordance with the interpretation scenario, smooth interpretation services can be provided between a talker 100 and listener 300 who use different languages. (See, Specification at page 8, lines 24-28 and page 14, lines 1-6). That is, with respect to the example illustrated in FIG. 6 of the instant application, not only is a current state conversion action selected in accordance with the interpretation scenario to convert the current state "ST\_START" to the next state "ST\_PlayWelcomeMent," but the basic telephone action of outputting a connection welcoming message for the next state "ST\_PlayWelcomeMent" is also selected in accordance with the interpretation scenario. Nagai, on the other hand, merely describes determining the necessary media conversion based on the media type of the sending means and the media type of the receiving means in accordance with the classification of conversion shown in FIG. 12. Thus, even if, *arguendo*, selecting a particular media conversion in accordance with the classification of conversion of FIG. 12 in Nagai could be considered selecting the current state conversion action in accordance with the predetermined interpretation scenario, nowhere does Nagai describe also selecting a basic telephone action for the next state in accordance with the classification of conversion of FIG. 12.

Thus, because Nagai does not describe each and every element as set forth in independent claim 1, as amended, Applicants submit that Nagai does not anticipate claim 1. (See, MPEP at §2131, citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). Accordingly, Applicants respectfully request that the rejection under 35 U.S.C. §102(e) of claim 1, and claim 4, which depends therefrom, be withdrawn. Similarly, for reasons analogous to those presented for claim 1, Applicants submit that Nagai also does not anticipate independent claim 7, as amended, and respectfully request that the rejection under 35 U.S.C. §102(e) of claim 7, and claims 8 and 9, which depend therefrom, be withdrawn. Claims 5 and 6 have been canceled, thereby rendering the rejection of claims 5 and 6 under 35 U.S.C. §102(e) moot.

#### **Claim Rejection – 35 U.S.C. §103(a)**

Claims 2, 3, 8 and 9 have been rejected under 35 U.S.C. §103(a) for allegedly being unpatentable over Nagai in view of U.S. Patent No. 6,286,033 to Kishinsky *et al.* ("Kishinsky"). Applicants traverse the rejection for at least the following reasons.

For at least the same reasons presented herein with respect to independent claims 1 and 7, from which claims 2, 3, 8 and 9 depend, Applicants submit that claims 2, 3, 8 and 9 are also patentable over Nagai, and that Kishinsky does not disclose, and is not purported to disclose, the teachings missing from Nagai. At a minimum neither Nagai nor Kishinsky teaches or suggests "a predetermined interpretation scenario that includes a current state conversion action selected according to a current state and in response to the event generated in the CTI module and a basic telephone action to be executed at a next state," and "selecting the current state conversion action and the basic telephone action for the next state

in accordance with the predetermined interpretation scenario when the event is generated in the CTI module," as recited in parent claims 1 and 7, as amended. Accordingly, because no combination of Nagai and Kishinsky teaches or suggests all of the claim limitations of dependent claims 2, 3, 8 and 9, Applicants respectfully request that rejection under 35 U.S.C. §103(a) of claims 2, 3, 8 and 9 be withdrawn. (See, MPEP §2143.03, citing *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974), requiring that all the claim limitations must be taught or suggested by the prior art to establish *prima facie* obviousness of a claimed invention).

### Conclusion

It is believed that this Amendment is accompanied by the required fee. However, if additional fees are required for any reason, please charge Deposit Account No. 02-4800 the necessary amount.

In the event that there are any questions concerning this paper, or the application in general, the Examiner is respectfully urged to telephone Applicants' undersigned representative so that prosecution of the application may be expedited.

Respectfully submitted,

BUCHANAN, INGERSOLL & ROONEY PC

By:

  
Charles F. Wieland III  
Registration No. 33,096

Date: January 17, 2008

P.O. Box 1404  
Alexandria, VA 22313-1404  
703 836 6620